SRF Round 3: CAA File Metric Calculation

state: Jefferson County, AL		Date of C	n-Site R	eview: 15/	08/2022							of FY 2021	Activity
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# Facility Name	Facility ID	2b	6a	6b	7a	8c	9a	10a	10b	14	11a	12a	12b
1 DRUMMOND COMPANY, INC. (ABC COKE)	ALJEF0000107300001	N	Υ	Υ	Y	Υ	Υ	Y	Υ	N/A	Y	Y	Y
2 BIRMINGHAM HIDE AND TALLOW	ALJEF0000107300057	N	Υ	Υ	Υ	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3 IKG/BORDEN (IKG INDUSTRIES)	ALJEF0000107300062	N	Υ	Υ	Y	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4 SMI STEEL, INC.	ALJEF0000107300080	N	Y	Y	Y	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
5 MPLX TERMINALS LLC BIRMINGHAM TERMINAL	ALJEF0000107300213	N	Υ	Y	Y	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6 NUCOR STEEL BIRMINGHAM,INC.	ALJEF0000107300260	Υ	Υ	Υ	Υ	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
7 SOUTHERN NATURAL GAS CORP.	ALJEF0000107300267	N	Υ	Υ	Y	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8 READY MIX USA,LLC	ALJEF0000107300271	Y	Y	Y	Υ	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
9 LEHIGH CEMENT COMPANY	ALJEF0000107300290	N	Y	Y	Y	N	Y	N/A	N/A	N/A	Y	Y	Y
0 BLUESTONE COKE	ALJEF0000107300355	N Y	Y	Υ Υ	Y	N N/A	N/A	N/A	N/A	N/A N/A	N/A N/A	N/A N/A	N/A
1 MILLER AND COMPANY LLC 2 OAK GROVE RESOURCES, LLC	ALJEF0000107300372 ALJEF0000107300395	N	Y	Y	Y	N/A N/A	N/A N/A	N/A N/A	N/A N/A	N/A N/A	N/A N/A	N/A N/A	N/A N/A
3 REMURIATE TECHNOLOGIES L.L.C.	ALJEF0000107300437	Y	Ϋ́	Ϋ́	Ϋ́	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
14 C&B PIPING, INC.(LEEDS)	ALJEF0000107300455	Ϋ́	Y	Ý	Y	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
15 BAMA CONCRETE BIRMINGHAM	ALJEF0000107300465	Y	Υ	Υ	Y	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
16 MERIDIAN BRICK, LLC BESSEMER PLANT NO. 6	ALJEF0000107300486	N	Υ	Υ	Υ	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
17 MELSUR CORPORATION	ALJEF0000107300494	Y	Υ	Υ	Y	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
18 READY MIX USA TARRANT FACILITY	ALJEF0000107300552	Y	Ÿ	Ϋ́	Y	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BELLSOUTH TELECOMMUNICTIONS, INC.DBA	ALJEF0000107301019	Y	Y	Y	Υ	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
AT&T ALABAM		'	-	-									<u> </u>
20 UNIVERSITY OF ALABAMA AT BIRMINGHAM	ALJEF0000107301044	N	Υ	Υ	Υ	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BAMA CONCRETE BIRMINGHAM, BESSEMER PLANT	ALJEF0000107301048	Y	Y	Y	Y	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
22 JEFFERSON COUNTY LANDFILL NO. 1	ALJEF0000107301052	N	Υ	Υ	Υ	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
23 BLAIR BLOCK LLC	ALJEF0000107301101	Y	Y	Υ	Υ	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
24 KINDERMORGAN SOUTHEAST TERMINALS LLC (FY 2020)	ALJEF0000107300235	N	Y	Y	Υ	N	Υ	N/A	N/A	N/A	Y	Υ	Y
25 BLUESTONE COKE (FY 2020)	ALJEF0000107300355	N	Υ	Υ	Υ	Υ	N/A	N	N/A	N	N/A	N/A	N/A
UNIVERSITY OF ALABAMA AT BIRMINGHAM (FY 2019)	ALJEF0000107301044	N	Υ	Y	Υ	N	Y	N/A	N/A	N/A	Υ	Y	Y
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SRF Round 3: CAA File Metric Calculation

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100 Total Yes Responses (Numerator)	11	26	26	26	2	4	1	1	0	4	4	4 Y
Total Responses (Denominator)	26	26	26	26	6	4			1	4	-	4

SRF Round 3: CAA File Metric Calculation

READ BEFORE STARTING:

Begin data entry in this tab. Enter based on each facility's File Review Checklist. Enter a Y for Yes and an N for No into the cells for each metric. If a metric does not apply to a particular

SRF Round 3: CAA File Metric Initial Findings

State: Je	fferson County, AL					Review of FY 2021 Activity					
CAA Metric#	CAA File Review Metric Description	Numerator	Denominator	Percentage	Goal	Initial Findings Details					
		ELI	EMENT 1: DA	ΓA							
2b	Accurate MDR data in AFS	11	26	42.3%	100%	Area for State Improvement					
		ELEME	NT 2: INSPEC	TIONS		improvement					
6a	Documentation of FCE elements	26	26	100.0%	100%	Meets or Exceeds Requirements					
6b	Compliance monitoring reports (CMRs) or facility files reviewed that provide sufficient documentation to determine compliance of the facility	26	26	100.0%	100%	Meets or Exceeds Requirements					
	ELEMENT 3: VIOLATIONS										
7a	Accurate compliance determinations	26	26	100.0%	100%	Meets or Exceeds Requirements					
8c	Accurate HPV determinations	2	6	33.3%	100%	Area for State Improvement					
		ELEMEN	IT 4: ENFORC	EMENT							
9a	Formal enforcement responses that include required corrective action that will return the facility to compliance in a specified time frame	4	4	100.0%	100%	Meets or Exceeds Requirements					
10a	Timeliness of addressing HPVs or alternatively having a case development and resolution timeline in place.	1	2	50.0%	100%	Area for State Improvement					
10b	Appropriate enforcement responses for HPVs	1	1	100.0%	100%	Meets or Exceeds Requirements					
14	HPV Case Development and Resolution Timeline (CD&RT) contains required policy elements	0	1	0.0%	100%	Area for State Improvement					
		ELEMI	ENT 5: PENAL	TIES		Masta as					
11a	Penalty calculations reviewed that document gravity and economic benefit	4	4	100.0%	100%	Meets or Exceeds Requirements					
12a	Documentation of rationale for difference between initial penalty calculation and final penalty	4	4	100.0%	100%	Meets or Exceeds Requirements					

SRF Round 3: CAA File Metric Initial Findings

Best Practice

Meets Requirements

Area for Attention

SRF Round 3: CAA File Metric Initial Findings

Meets or

12b Penalties collected 4 4 100.0% 100% Exceeds
Requirements

Finding Category Descriptions

Meets or Exceeds Expectations: The SRF was established to define a base level or floor for enforcement program performance. This rating describes a Area for State Attention: Area for State Attention: An activity, process, or policy that one or more SRF metrics show as a minor problem. Where Area for State Improvement: EPA will develop a finding of Area for State Improvement whenever an activity, process, or policy that one or more SRF metrics under a specific element show as a significant problem that the agency is required to address. A finding for improvement should be developed Instructions:

Numerator, Denominator, and Metric Value: Pulls values automatically from Step 1.

Initial Findings: Choose one of three finding categories listed in the drop-down menu.

Details: Provide additional details to substantiate the initial finding.

Sta	: Jefferson County, AL Facility Name	Facility ID	General comments
1	DRUMMOND COMPANY, INC. (ABC COKE)	Facility ID ALJEF0000107300001	General comments

Review of FY 2021 Activity 2b comments	6a comments	6b comments	7a comments	8c comments
Stack tests: ICIS indicates that stack tests were conducted on 10/6/2020 (pass); 12/3/2021 (pass); 5/24/2021 (fail); 7/6/2021 (pass, PM); 9/28/2021 (pending, SO2). For the stack tests conducted on 10/6/2020, 12/3/2020, 5/24/2021 the pollutant was not listed, and for the stack test conducted on 9/28/2021 the results are listed as pending. T5 ACC: ICIS indicates that a T5 ACC was received on 1/28/2021 and was reviewed on 1/28/2021. The file contained a T5 ACC dated 12/15/2020 and received by Jefferson County on 12/22/2020. The Jefferson County tracking document indicates that the T5 ACC was received on 12/17/2020 and reviewed on 1/28/2021. Informal enforcement actions: The file contained a copy of an NOV dated 8/20/2021, issued for a failed stack conducted on 5/25/2021. The NOV was not listed in ICIS. Formal enforcement actions: The file contained a release agreement dated 8/23/2021 that assessed the facility a \$42,000 civil penalty. The formal action was not listed in ICIS. Penalty: The file contained a copy of a civil penalty in the amount of \$42,000. The civil penalty amount was not listed in ICIS.				

9a comment	10a comments	10b comments	14 comments	11a comments	12a comments	12b comments

2	BIRMINGHAM HIDE AND TALLOW	ALJEF0000107300057	
3	IKG/BORDEN (IKG INDUSTRIES)	ALJEF0000107300062	
4	SMI STEEL, INC.	ALJEF0000107300080	
5	MPLX TERMINALS LLC BIRMINGHAM TERMINAL	ALJEF0000107300213	
6	NUCOR STEEL BIRMINGHAM,INC.	ALJEF0000107300260	
7	SOUTHERN NATURAL GAS CORP.	ALJEF0000107300267	
8	READY MIX USA,LLC	ALJEF0000107300271	

Facility identification – Data in ICIS compared to reports and street number not included in the address. Air Programs & CMS Source – ICIS indicates that the facility is subject to NSPS Dc. The permit and the inspection report indicate that the facility is subject to MACT JJJJJJ and NSPS Dc. ICIS does not include that the facility is subject to MACT JJJJJJ.				
FCE: ICIS indicates that two FCEs were completed on 5/5/2021. The file contained a copy of an inspection report for an FCE conducted on 5/5/2021. The Jefferson County tracking document indicates that one FCE was completed on 5/5/2021. The FCE was entered into ICIS twice and one should be deleted.				
Air Programs – Review of Title V permit shows facility is subject to Part 63, Subpart YYYYY (EAF Area source rule). ICIS does not indicate applicability to any Part 63 rule.				
Air Programs – Review of Title V permit shows facility is subject to Part 63, Subpart BBBBBB (Bulk terminal area source rule). ICIS does not indicate applicability to any Part 63 rule.				
T5 ACC – The T5 ACC reviewed on 10/8/2020 was entered into ICIS twice. Air Programs – The facility is subject to Part 63, Subpart ZZZZ. There is no information regarding MACT applicability listed in ICIS.				

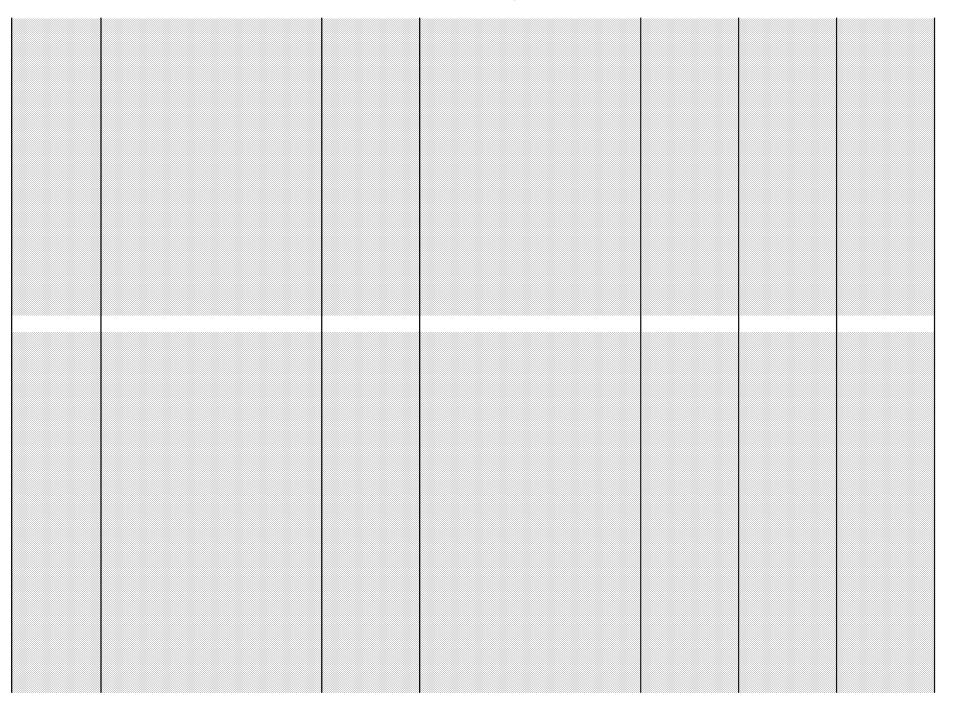
9	LEHIGH CEMENT COMPANY	ALJEF0000107300290	

Stack test: ICIS indicates that two stack tests were conducted. One test was conducted on 9/13/2021 (pass, PM), and the other test was conducted on 9/21/2021 (failed. PM). The file contained a copy of a report for testing that was conducted on 9/13-16/2021, and a copy of a report for testing that was conducted on 9/21-23/2021. The file contained a copy of a report for the retest that was conducted on 11/30/2021 - 12/1/2021. ICIS indicates that at a test was conducted on 11/30/2021 but the results indicate pending. The retest results were not updated in ICIS. T5 ACC: The file contained a copy of T5 ACC dated Jefferson County issued an NOV dated 11/12/2020 and received by Jefferson County on 11/10/2021 for failing a stack test on 11/24/2020. The Jefferson County tracking document 9/21/2021. The NOV was not listed in indicates that the T5 ACC was received on 11/24/2020 ICIS and not identified as an FRV. and reviewed on 12/1/2020. The November 2020 T5 ACC information was not entered into ICIS. FRV: ICIS indicates that no violation (FRV or HPV) was identified in fourth quarter of 2021 or the first and second quarter of 2022. The file contained a copy of an NOV dated 11/10/2021 for the failed stack test that was conducted on 9/21/2021. The FRV was not entered into ICIS. Informal enforcement actions: The file contained a copy of an NOV dated 11/10/2021 for the failed stack test that was conducted on 9/21/2021. The NOV was not entered into ICIS.

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10	BLUESTONE COKE	ALJEF0000107300355	
11	MILLER AND COMPANY LLC	ALJEF0000107300372	
12	OAK GROVE RESOURCES, LLC	ALJEF0000107300395	

T5 ACC: ICIS indicates that a T5 ACC was received on 1/27/2021 and reviewed on 1/27/2021. The file contained			
a copy of the T5 ACC dated 1/28/2021. The Jefferson County tracking document indicates that the T5 ACC was received on 12/19/2020 and reviewed on 1/14/2021. The T5 ACC received date and the review date listed in ICIS			Jefferson County issued an NOV dated 9/16/2021 for failing to install and properly maintain baffles in quench
do not match the dates in the file. Informal enforcement action: The file contained a copy of an NOV that was issued on 9/16/2021. The NOV is not listed in ICIS.			tower identified during the 9/8/2021 onsite PCE. The NOV was not listed in ICIS.
Air programs: This was identified under file #25, and not included here as well.			
Facility Identifiers: ICIS indicates that the facility is names Oak Grove Resources. The permit in the file indicates			
that the facility name is Crimson Oak Grove Resources. T5 ACC: ICIS indicates that the T5 ACC was received on 5/5/2021 and reviewed on 5/5/2021. The file contained a			
copy of the TT ACC that was received by Jefferson County on 4/12/2021, the Jefferson Count tracking document indicates that the T5 ACC was received on			
4/12/2021 and reviewed on 5/5/2021. The date the T5 ACC was received that is listed in ICIS is different than the date found in the file.			
Air programs and subparts: The permit indicates that the facility is subject to the requirements of MACT subpart CCCCC. ICIS does not list that the facility is subject to			
MACT subpart CCCCC.			

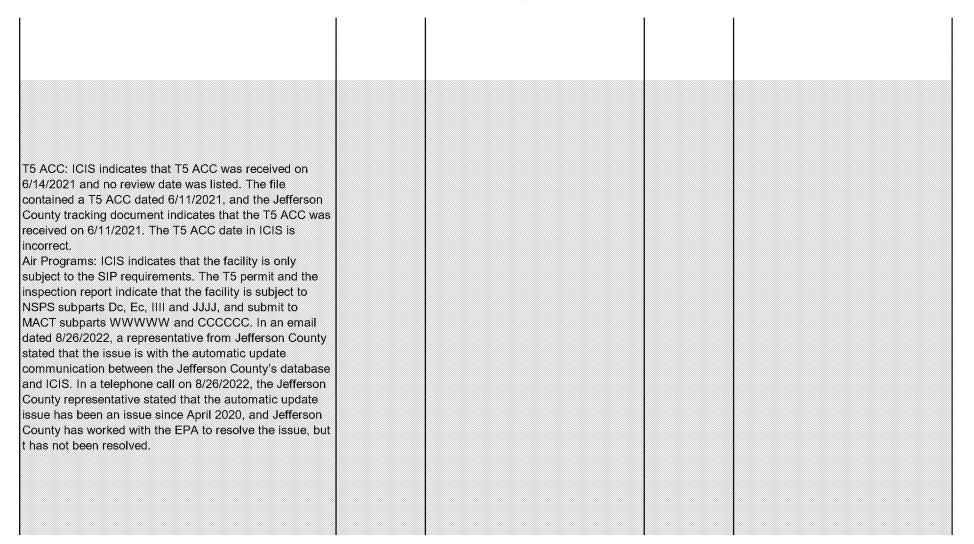


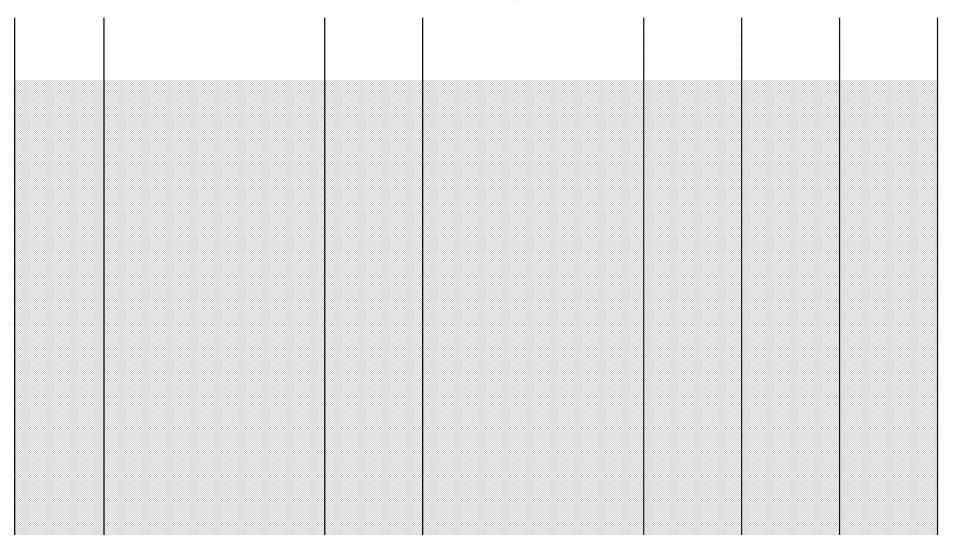
13	REMURIATE TECHNOLOGIES L.L.C.	ALJEF0000107300437	Facility identifiers: ICIS indicates that the address is Tin Mill Road and does not include the street number. However, the permit and documents in the file indicate that the address to be 830 Tin Mill Road.
14	C & B PIPING, INC.(LEEDS)	ALJEF0000107300455	T5 ACC: ICIS indicates that a T5 ACC was received on 5/5/2021 but a review date is not listed in ICIS. The file contained a copy of a T5 ACC received by Jefferson County on 4/14/2021. The Jefferson County tracking document indicates that the T5 ACC was received by Jefferson County on 4/14/2021 and reviewed on 5/5/2021. The T5 ACC received date was not entered into ICIS.
15	BAMA CONCRETE BIRMINGHAM	ALJEF0000107300465	FCE: ICIS indicated that two FCEs were completed on 10/27/2020 and 10/27/2020. The file contained a copy of an inspection report dated 10/27/2020. A representative from Jefferson County, stated that there was only one FCE completed on 10/27/2020 and the other was a duplicate entry. One entry has been deleted from ICIS. Facility: ICIS indicates that this facility is still operating but the inspection report indicates that the facility has permanently shutdown. A representative for Jefferson County, indicated that the operating status will be changed to shutdown.

16	MERIDIAN BRICK, LLC BESSEMER PLANT NO. 6	ALJEF0000107300486	The inspection report does not have section pertaining to previous enforcement actions.
17	MELSUR CORPORATION	ALJEF0000107300494	The inspection report does not have section pertaining to previous enforcement actions FCE: ICIS indicates that two FCEs were
18	READY MIX USA TARRANT FACILITY	ALJEF0000107300552	completed on 10/21/2020. The file contained a copy of an inspection report dated 10/23/2020 for an onsite inspection that was conducted on 10/20/2020. A representative from Jefferson County, stated that there was only one FCE completed on 10/21/2020 and the other was a duplicate entry. One entry has been deleted from ICIS. The inspection report does not have section pertaining to previous enforcement actions.

T5 ACC: ICIS indicates that the T5 ACC was received on		
5/18/2021, and ICIS does not indicate whether the ACC was reviewed or if the facility reported any deviations. The file contained a copy of the T5 ACC dated 4/27/2021 and received by Jefferson County on 5/3/2021. The Jefferson County tracking document indicates that the T5 ACC was received on 5/3/2021 and reviewed on		
5/18/2021. The data in ICIS appears to be incorrect. Air Programs: ICIS indicates that the facility is subject to 40 CFR Part 63 subpart JJJJJ. However, the permit does not indicate that the facility is subject to the MACT JJJJJ. In a telephone conversation with a representative from Jefferson County, the representative stated that the facility is not subject to MACT JJJJJ, and that the citation		
will be removed.		

19	BELLSOUTH TELECOMMUNICTIONS, INC.DBA AT&T ALABAM	ALJEF0000107301019	The inspection report does not have section pertaining to previous enforcement actions, and did not list all applicable requirements.
20	UNIVERSITY OF ALABAMA AT BIRMINGHAM	ALJEF0000107301044	The inspection report does not have section pertaining to previous enforcement actions.

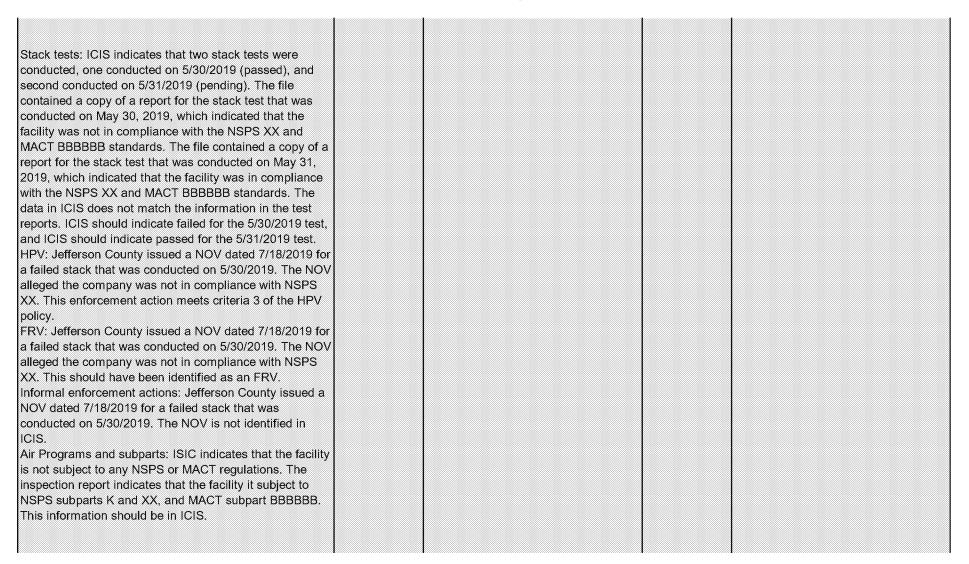


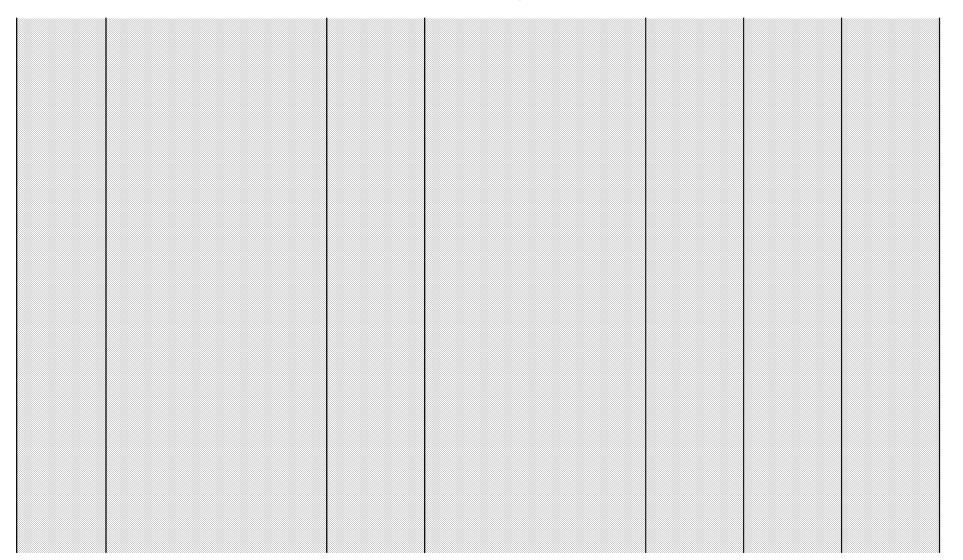


21	BAMA CONCRETE BIRMINGHAM, BESSEMER PLANT	ALJEF0000107301048	FCE: ICIS indicates that two FCEs were completed on 10/20/2020. The file contained a copy of an inspection report dated 10/20/2020 for an onsite inspection that was conducted on 10/20/2020. A representative from Jefferson County, stated that there was only one FCE completed on 10/21/2020 and the other was a duplicate entry. One entry has been deleted from ICIS. The inspection report does not have section pertaining to previous enforcement actions.
22	JEFFERSON COUNTY LANDFILL NO. 1	ALJEF0000107301052	
23	BLAIR BLOCK LLC	ALJEF0000107301101	The opening paragraph of the report indicates that the facility is not in compliance but in the body of the report there was no mention of compliance issues. In an email dated 8/29/2022, a representative from Jefferson County state that the it was a typo and that there were no compliance issues identified during the inspection.

T5 ACC: ICIS indicates that a T5 ACC was received on 6/15/2022, and a second T5 ACC was received on 6/15/2020. The file contained a copy of the T5 ACC dated 6/6/2021. The Jefferson County tracking document indicates that the T5 ACC was received and reviewed on 6/14/2021. In an email dated 8/29/2022, a representative from Jefferson County indicated that the activity was entered in ICIS twice by mistake.	The inspection report does not have section pertaining to previous enforcement actions.	
	The inspection report does not have section pertaining to previous enforcement actions.	

24	KINDERMORGAN SOUTHEAST TERMINALS LLC (FY 2020)	ALJEF0000107300235	





25	BLUESTONE COKE (FY 2020)	ALJEF0000107300355	

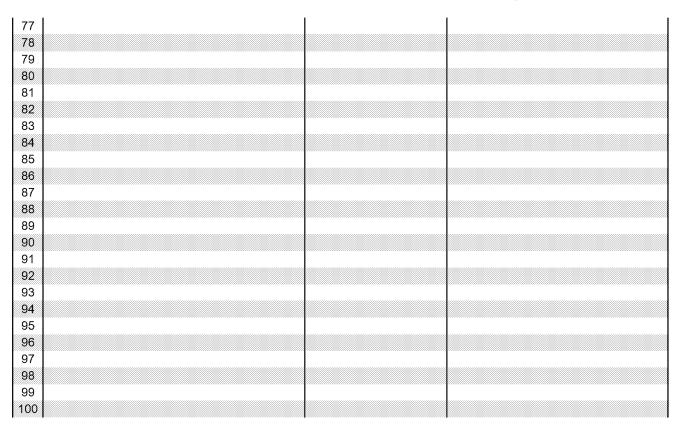
FCE: ICIS indicates that two FCEs were completed one			
on 9/14/2020 and the other on 9/30/2020. The file contained a copy of an inspection report for the 9/30/2020			
FCE. The Jefferson County tracking document indicates			
that the FCE was conducted on 9/30/2020. In an email dated 8/31/2022, a representative from Jefferson County			
stated that the 9/30/2020 was the FCE and that on			
9/14/2020 that an in-depth monitoring inspection. The 9/14/2020 onsite evaluation should not have been			
identified as an FCE.			
Informal enforcement action: The file contained an NOV dated 7/15/2020 for violating the requirements of MACT			
subparts L and CCCCC. The NOV was not in ICIS.			
Air programs: The 2009 permit indicates that the facility is subject to 40 CFR part 61 subpart FF, but ICIS does			
not list part 61 subpart FF. In an email dated 9/1/2022, a			
representative from Jefferson County indicated that the			
facility is subject to the subpart, and the information was not transferred to the new data system.			
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	Day zero was identified as 7/16/2020, and Jefferson County and the company are currently negotiating the terms of the settlement. The file did not contain a case development and resolution timeline. In an email dated 8/31/2022, a representative from Jefferson County indicated that case development and resolution timeline was not prepared but the program did discuss the case during the routine enforcement calls with the EPA.		The file did not contain a case development and resolution timeline. In an email dated 8/31/2022, a representative from Jefferson County indicated that case development and resolution timeline was not prepared but the program did discuss the case during the routine enforcement calls with the EPA.				
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26	UNIVERSITY OF ALABAMA AT BIRMINGHAM (FY 2019)	ALJEF0000107301044	Air Programs: ICIS did not list all applicable regulations. This was identified with file #20 UAB (FY2021), so this was not identified as a deficiency under this file.
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29 30 31 32 33			
34 35			

during the review year, one on 7/29/2019, and the other on 7/30/2019. The file contained a copy of an inspection report for the onsite inspection that was conducted on 7/29/2019 through 7/31/2019. The Jefferson County racking document indicates that the inspection was conducted on 7/31/2019. In an email dated 8/31/2022, a representative from Jefferson County stated that there wo different dates (7/29/2019 and 7/30/2019) because the inspection occurred over two days. The inspection report and the Jefferson County tracking document indicate conflicting information than what has been entered into ICIS. FRY: ICIS indicates that no FRV was identified during the review year. An NOV was issued to the company on 10/23/2018 for late submittal of T5 ACC, This violation should have been identified as an FRV. Informal enforcement action: ICIS indicates that no NOV was issued, but the file contained a copy of an NOV dated 10/23/2018. The NOV was issued for late submittal of a T5 ACC. Formal enforcement action: ICIS indicates that an Administrative Order was issued on 12/5/2018. The file contained a copy of a release agreement dated		
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Instructions: Use as needed to organize facility-specific notes from the file review checklists.

